

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

LAURA FARINA,

Plaintiff,

v.

**MIDLAND CREDIT
MANAGEMENT INC.,**

Defendant.

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CASE NO. 3:24-cv-00213-RDM

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
ANSWER COMPLAINT**

Defendant Midland Credit Management, Inc. respectfully moves the Court to extend its deadline by which to respond to Plaintiff’s Complaint by fourteen (14) days, and in support thereof avers as follows:

1. Plaintiff Laura Farina filed her Complaint in the Court of Common Pleas of Pike County on or about January 4, 2024. ECF 1-2.
2. Defendant Midland Credit Management, Inc. (“MCM”) removed this case to this Court on February 6, 2024. ECF 1.
3. MCM’s responsive pleading is due February 13, 2024. Fed. R. Civ. P. 81(c)(2)(C).
4. MCM now respectfully moves for an extension of time to answer Plaintiff’s Complaint.

5. When an act must be done within a specified period, the Court may, with or without motion or notice, extend the period of time to complete the act prior to the expiration of the original deadline upon a showing of good cause. Fed. R. Civ. P. 6(b).

6. Here, good cause exists to extend MCM's responsive pleading deadline. Specifically, MCM's investigation of Plaintiff's claims is in its infancy, and further investigation is required in order for MCM to substantively respond to Plaintiff's Complaint.

7. Plaintiff will not be prejudiced by this short extension, and has no opposition to this Motion.

8. The requested extension will not delay the progression of the case, as the Initial Case Management Conference has not yet been scheduled and no case management deadlines are in place.

9. This is MCM's first request for an extension of time. Its request is made in good faith and solely for the purpose stated in this Motion.

WHEREFORE, Defendant Midland Credit Management, Inc. respectfully requests that this Honorable Court grant its Motion and extend its responsive pleading deadline by fourteen (14) days, up to and including February 27, 2024.

Respectfully submitted,

MESSER STRICKLER BURNETTE, LTD.

By: /s/ Lauren M. Burnette
LAUREN M. BURNETTE, ESQUIRE
PA Bar No. 92412
12276 San Jose Blvd.
Suite 718
Jacksonville, FL 32223
(904) 527-1172
(904) 683-7353 (fax)
lburnette@messerstrickler.com
Counsel for Defendant

Dated: February 12, 2024

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

I certify that on February 12, 2024, I sought concurrence from Plaintiff's counsel in this Motion, and Plaintiff's counsel confirmed Plaintiff has no opposition to the Motion.

MESSER STRICKLER BURNETTE, LTD.

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Suite 718
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(904) 683-7353 (fax)
lburnette@messerstrickler.com
Counsel for Defendant

Dated: February 12, 2024

CERTIFICATE OF SERVICE

I certify that on February 12, 2024, a true copy of the foregoing document was served on all counsel of record by electronic service.

MESSER STRICKLER BURNETTE, LTD.

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